

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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WORKERS UNITED,	:	
	:	
<i>Plaintiff,</i>	:	
	:	Civil Action No. 2:23-cv-4036
v.	:	
	:	
STARBUCKS CORPORATION,	:	
	:	
<i>Defendant.</i>	:	
	:	

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**JOINT MOTION TO STAY**

Plaintiff Workers United and Defendant Starbucks Corporation (“Starbucks”) (collectively, the “Moving Parties”), hereby jointly move the Court for an order staying the proceedings and all deadlines in order to facilitate the Moving Parties’ good-faith negotiations subsequent to alternative dispute resolution via private mediation. In support thereof, the Moving Parties state as follows:

1. On October 18, 2023, Plaintiff filed a Complaint against Starbucks in this Court. (Dkt. No. 1)
2. On October 18, 2023, Defendant Starbucks filed a complaint in the Southern District of Iowa. That case involves the same Parties, Workers United and Starbucks, and related claims and facts. *See Starbucks Corp. v. Workers United*, No. 23-00068 (S.D. Iowa) (the “Iowa Action”).
3. On November 20, 2023, this Court granted Starbucks an extension to answer, move, or otherwise respond to the Complaint until January 22, 2024. (Dkt. No. 13)
4. On December 1, 2023, in the Iowa action, Judge Locher granted an extension to move or otherwise respond to Starbucks’ First Amended Complaint until January 22, 2024.

5. On January 18, 2024, the Moving Parties sought a stay in both this action and the Iowa Action to facilitate their efforts to pursue alternative dispute resolution, and a stay was entered in the Iowa Action the same day. On January 19, 2024, this Court denied the request for a stay in this matter. (Dkt. No. 16)

6. Thereafter, Starbucks timely filed a Motion to Dismiss on January 22, 2024 (Dkt. No. 19), and Workers United filed a First Amended Complaint on February 12, 2024 (Dkt. No. 27). Starbucks response to the First Amended Complaint is currently due on Monday, February 26, 2024.

7. On February 21, 2024, the Moving Parties participated in a full-day mediation session with Mr. David Geronemus, Esq. That session was productive, and the Moving Parties have agreed to engage in further good-faith negotiations.

8. Although this Court previously denied a joint motion for stay pending the initial mediation session, the Moving Parties respectfully submit that their negotiations, which are now further along and more well developed, will be aided by a brief stay in this matter so that they may focus their time, efforts, and resources on further negotiations, without concurrently engaging in motion practice in this Court. Accordingly, the Moving Parties respectfully move this Court to stay all proceedings for twenty-eight days, until Friday, March 22, 2024, and to set that date as the deadline for Starbucks to answer, move, or otherwise respond to the First Amended Complaint.

9. This Motion is made in good faith and is not interposed for delay or any other improper purpose.

10. The Moving Parties agree that the filing of this joint Motion shall not be to the prejudice of any party, including but not limited to a party citing to any delay in another party's claim, defense, motion, or argument on account of this Motion.

11. If this Court grants the requested stay, the Moving Parties will similarly seek to extend the stay of all proceedings and deadlines in the Iowa Action until March 22, 2024. Because the Moving Parties believe that a stay in both matters will facilitate their dispute resolution negotiations, in the event that the stay is not extended in the Iowa Action, the Moving Parties reserve the right to move for a lift of any stay the Court grants pursuant to this Motion.

WHEREFORE, the Moving Parties respectfully request the Court stay all proceedings in this matter until March 22, 2024, and set that date as the deadline for Starbucks to answer, move, or otherwise respond to the First Amended Complaint.

Dated: February 23, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February 2024, I caused the foregoing Joint Motion to Stay to be electronically filed using the Court's CM/ECF system, which will send notification of such filing to all current counsel of record.

*/s/ Ilana H. Eisenstein*

Ilana H. Eisenstein